

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Neuro and Cardiac Technologies, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 4:18-cv-01517
)	
LivaNova, Inc., and)	JURY TRIAL DEMANDED
LivaNova USA, Inc.,)	
)	
<i>Defendants.</i>)	
)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Defendants LivaNova, Inc. and LivaNova USA, Inc. (collectively, "LivaNova") hereby move this Court to extend the time for LivaNova to respond to Plaintiff Neuro and Cardiac Technologies, LLC's Original Complaint by thirty (30) days, up to and including July 13, 2018, and in support thereof would show as follows:

Plaintiff served LivaNova through Certified Mail dated May 23, 2018.

LivaNova's current deadline to respond to Plaintiff's Original Complaint is June 13, 2018. Fed. R. Civ. P. 12(a)(1)(A)(i).

This is LivaNova's first request for an extension of time to respond to Plaintiff's Original Complaint.

Plaintiff Neuro and Cardiac Technologies, LLC does not oppose the relief requested by this motion.

WHEREFORE, LivaNova respectfully requests that this Court enter the proposed order accompanying this motion.

Dated: June 5, 2018

Respectfully submitted,

/s/ Jamie H. McDole

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*Attorney for Defendants
LivaNova, Inc. and LivaNova USA, Inc.*

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on May 31, 2018, pursuant to Local Rule 7.1(D), counsel for LivaNova, Inc. and LivaNova USA, Inc., (collectively, “LivaNova”), Jamie H. McDole, met and conferred with counsel for Plaintiff Neuro and Cardiac Technologies, LLC, Eric M. Albritton, regarding the substance of this Motion. Plaintiff does not oppose this motion

/s/ Jamie H. McDole

Jamie H. McDole

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system pursuant to Local Rule 5.1, which will automatically generate and send email notification of such filing to all counsel of record.

/s/ Jamie H. McDole

Jamie H. McDole